

February 26, 2009

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36

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Centennial Puerto Rico Operations Corp.  
d/b/a Centennial de Puerto Rico

Dear Secretary Dortch:

Enclosed please find our Annual CPNI Certification and Statement Concerning Procedures Ensuring Compliance with CPNI Regulations.

Should you have any questions or need additional information, please contact the undersigned.

Very truly yours,



William L. Roughton, Jr.  
Vice President Legal & Regulatory Affairs

Enclosures

cc: Federal Communications Commission,  
Enforcement Bureau, Telecommunications Consumers Division  
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Centennial Puerto Rico Operations Corp.  
d/b/a Centennial de Puerto Rico<sup>1</sup>

Form 499 Filer ID: 811030

Name of signatory: Carlos Blanco

Title of signatory: President, Centennial Puerto Rico Operations Corp. d/b/a Centennial de Puerto Rico

I, Carlos Blanco, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



Carlos Blanco  
President, Centennial Puerto Rico Operations Corp.  
d/b/a Centennial de Puerto Rico

<sup>1</sup>Centennial Puerto Rico Operations Corp. d/b/a Centennial de Puerto Rico provides commercial mobile radio services in Puerto Rico. Centennial Puerto Rico Operations Corp. also provides broadband services in Puerto Rico, but under a different "doing business as" name: "Centennial Business Solutions." Centennial Puerto Rico Operations Corp. d/b/a Centennial Business Solutions is submitting concurrently with this certification, a CPNI certification for its broadband business.

## STATEMENT CONCERNING PROCEDURES ENSURING COMPLIANCE WITH CPNI REGULATIONS

The operating procedures and practices of Centennial Puerto Rico Operations Corp. d/b/a Centennial de Puerto Rico (“Centennial PR”) ensure that Centennial PR complies with the Commission’s rules at 47 C.F.R. § 64.2001, *et seq.*, governing the use of customer proprietary network information (“CPNI”). Compliance with such rules is demonstrated by the policies and practices employed by Centennial PR, a brief explanation of which is provided below.

First, Centennial PR only provides one category of services to its customers—commercial mobile radio service or “CMRS.” Therefore, Centennial PR only uses CPNI to market various CMRS calling plans or CMRS features to customers who already purchase CMRS services from Centennial PR, which does not require customer approval under the Commission’s rules. (Should Centennial PR expand its business to include other categories of service, it will implement a system to clearly establish the status of a customer’s CPNI approval prior to any use of, disclosure of or permitting access to its customers’ CPNI.<sup>2</sup>)

Second, Centennial PR does not disclose CPNI to, or permit access to CPNI, by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter), as is necessary for the provision of the CMRS service itself, or in connection with the use of contract workers. In any case, any third parties to which CPNI is disclosed or who are given access to CPNI are only given access to appropriate CPNI for the third party’s purpose, and only after executing a confidentiality agreement or pursuant to the terms of a valid subpoena, court order, etc.

Third, Centennial PR employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

1. Centennial PR provides all employees with a copy of its corporate privacy policy, which is contained in a document entitled “Code of Conduct.” The Code of Conduct instructs employees to not disclose any customer account information to anyone, except as authorized by law and to seek advice from the legal department if the employee has a question regarding the validity of a subpoena, court order, etc. to disclose customer

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<sup>2</sup> As explained in footnote one of the attached certification, Centennial Puerto Rico Operations Corp. d/b/a Centennial de Puerto Rico provides CMRS services, and Centennial Puerto Rico Operations Corp. d/b/a Centennial Business Solutions (“Centennial Business Solutions”) provides broadband services. Centennial PR does not disclose CMRS customers’ CPNI, or provide access to such information, to Centennial Business Solutions.

information. Moreover, sales and customer service employees receive additional instruction on the proper handling of confidential customer information.

2. Centennial PR has a disciplinary program to ensure compliance with its operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.

3. Centennial PR maintains records of marketing campaigns that use Centennial PR customer CPNI, as well as those occasions where CPNI is released to third parties (such a release occurring pursuant to a valid subpoena). Marketing activities are supervised by the Vice President of Marketing and Sales. Records of marketing campaigns and any CPNI releases to third parties are retained for at least one year.